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ABSTRACT

The ways in which the regional accrediting commissions are responding effectively in the evaluation of rapidly changing postsecondary education institutions are described. Differences between the roles of the accrediting commissions and the state agencies are examined, and ways to develop more cooperative relationships are suggested. The primary means by which the accrediting commission determines institutional effectiveness and provides this public assurance is through the accreditation process, a program of periodic evaluation. Among the developments that have occurred in the regional accrediting commissions to be responsive to changing conditions are the following: examination and revision of the commissions' processes for institutional evaluation, with more specific criteria for accreditation and clearer information; serious consideration of the due process components of the review process; sharpening of annual reports required of institutions so that changes of a limited nature can be discovered and monitored; and development of sequential evaluation processes for cooperative efforts across regional boundaries. Areas of continuing concern include: the evaluation of off-campus programs in another region, the evaluation of institutions with external graduate degrees, the specificity of standards or criteria, and the evaluation of institutions perceived as nontraditional. Among the differences between regional accrediting commissions and state agencies are the following: the focus of the regional accrediting commission is on the institution, while the focus of the state agency is the wise expenditure of state resources; the regionals treat public and private institutions alike; and accrediting commissions are private nongovernmental associations of institutions. Five ways to develop cooperative relationships between state and accrediting agencies are suggested. (SW)

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ROLES, RELATIONSHIPS, RESPONSIBILITIES OF STATES, FEDERAL AGENCIES, AND ACCREDITING ASSOCIATIONS--THE PERSPECTIVE OF THE REGIONAL ACCREDITING COMMISSION

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EVALUATING QUALITY: ROLES, RELATIONSHIPS, RESPONSIBILITIES OF STATES, FEDERAL AGENCIES, AND ACCREDITING ASSOCIATIONS--THE PERSPECTIVE OF THE REGIONAL ACCREDITING COMMISSION

I am delighted to be a part of this fourth annual Advanced Leadership Seminar for State Academic Officers which is focusing on quality in higher education, and pleased to represent the perspective of the regional accrediting commissions on this panel. However varied the roles, relationships, and responsibilities of the states, federal agencies, and accrediting associations, I believe that we have these qualities in common:

1. our commitment to educational quality, and our common, difficult task of determining and perfecting the means to define, assess, and assure quality in the higher education institutions for which we are in some way responsible;

2. our belief in higher education as an institution in our society--an institution that, though beset by difficulties and buffeted by change, is infinitely worth preserving and enhancing as a part of American society;

3. our belief in the urgent need to develop productive ways to help individual human beings acquire the knowledge, skills, and wisdom necessary for coping in an increasingly complex and rapidly changing world.

As a staff member of the largest of the regional accrediting commissions (19 states, 949 applying and member institutions) since 1972, I have worked with more than 300 institutions of all sizes, shades, and types, including a number of those institutions regarded as nontraditional and many with off-campus programs in other states and regions. These experiences have convinced me that the regional accrediting commission plays a unique role in the Educational Triad. Unlike the federal government and the state agencies, the regional accrediting commission is a private, voluntary, nongovernmental association created and supported by its individual institutional members themselves. Our primary responsibility, then, is to those institutions.

My purpose is to present positive evidence of the emerging effectiveness of the regional accrediting commission in the maintenance of quality in rapidly changing educational institutions. I will also point out some ways in which the regional accrediting commissions differ from state agencies for postsecondary education and will suggest some ways that we may develop more cooperative relationships.

Presentation by Dr. Patricia Thrash, Associate Director, North Central Association's Commission on Institutions of Higher Education, for the Fourth Annual Advanced Leadership Seminar for State Academic Officers Inservice Education Program, July 28, 1980, San Antonio, Texas

Emerging Effectiveness of the Regional Accrediting Commission in the Maintenance of Quality in Rapidly Changing Educational Institutions

My premise is that educational institutions and the agencies that serve them must be responsive to societal realities or cease to be effective. An organism that fails to adapt to a changing environment becomes extinct.

An exploding educational universe coupled with institutions' struggle for survival in the face of escalating costs, dwindling enrollments, increased competition for students, changes in the amount of federal support for institutions, and fierce competition for the new student clienteles has created new institutions and has transformed existing institutions. These institutional changes, in terms of both their quality and the rapidity of change, have posed a direct challenge to the regional accrediting commission and have caused it to reexamine and revise the ways in which it works with institutions to carry out its historic functions.

The regional accrediting commission has two primary functions:

1. to assist institutions in their improvement;
2. to provide assurance to the public that those institutions listed as members of the commission meet certain criteria or standards: they have a clear mission, publicly stated and appropriate to a postsecondary education institution; their educational programs and the degrees awarded are consistent with that mission; they have the resources (human, educational, physical, fiscal) and processes (organization for decision-making, evaluation, and planning) to carry out that mission; they provide evidence that they are, indeed, carrying out that mission effectively; and they demonstrate stability and continuity of such strength that they can be expected to continue to carry out that mission effectively in the future.

The primary means by which the accrediting commission determines institutional effectiveness and provides this public assurance is through the accreditation process, a program of periodic (at least once every ten years) evaluation which includes these steps: (1) institutional self-study and submission of a self-study report to the commission; (2) on-site evaluation visit by a team of professional peers who prepare a report and recommendation for the commission; (3) submission of an institutional response to the team report; (4) review of the report and response by another group of experienced educators appointed by the commission; and (5) accrediting action taken by the commission or its designated board. There is also an opportunity for appeal of the decision by the institution, if this is warranted. This many-layered process is designed to ensure a fair evaluation for the institution and to provide assurance of the validity of the action taken. At the successful conclusion of this process, the institution is listed as a member of the association in the public documents of the commission.

The regional accrediting commissions have a long history of working productively together, and there is a high degree of communication and cooperation among the executive staffs. These cooperative relationships were formalized in 1964 with the establishment of FRACHE, the Federation of Regional Accrediting Commissions

in Higher Education. Meeting annually from 1964 to 1975, the regional staffs developed a series of policy statements on the purposes and practices of institutional accreditation and other areas of concern and interest. Some of these documents were prescient: in 1966, statements on Institutional Integrity, a Code of Good Practice in Accrediting in Higher Education, and Collegiate Programs on Military Bases; in 1970, Innovation; in 1973, the Interim Statement on Accreditation and Non-Traditional Study, the Interim Guidelines on Contractual Relationships with Non-Regionally Accredited Organizations, Substantive Change, and Operationally Separate (Separately Accreditable) Units. These working agreements provided coherence and continuity to accreditation in a time of rapid change, and they served as primary source documents to the regional commissions in the revision of their own policies.

With the creation of COPA, the Council on Postsecondary Accreditation, in 1975, the regional staff officers continued to meet informally. In additional attempts to develop responsiveness to a rapidly changing postsecondary education universe, the executive staffs of the regionals have involved their commissions in a series of national studies focused on areas of immediate concern: on the evaluation of educational outcomes as a part of the institutional self-study process; on the evaluation of nontraditional learning; and on the evaluation of military base programs.

What are some of the developments that have occurred in the regional accrediting commissions? Here are a few:

+ examination and revision of the commissions' processes for institutional evaluation, with more specific criteria for accreditation and clearer information through revised handbooks and new or strengthened policies.

+ serious consideration of the due process components of the review process, with efforts made to provide institutions with more information along the way and, in some regionals, with opportunities to respond to the tentative recommendation before final action is taken.

+ more direct staff assistance to institutions as they move through the evaluation process.

+ sharpening of annual reports required of institutions, so that changes of a limited nature can be discovered and monitored.

+ clearer, more specific requirements for institutions contemplating limited or substantive change, with procedures for approval required before the initiation of the change.

+ development of sequential evaluation processes for cooperative efforts across regional boundaries to examine an institution of one region that has off-campus programs in another region or on military bases. (A first step in that process is that the institution have the approval of the appropriate state agency or military base officer to offer the program.)

+ development of much more specific questions to be asked of institutions with off-campus programs to determine that the programs are effective.

While these developments are heartening, there are areas of continuing concern. Let me cite a few of them:

1. the evaluation of off-campus programs in another region. Although we all have our share of "horror stories" about some of these programs, I must emphasize that the number of institutions that are the subject of these stories is quite small indeed compared to the total universe of accredited institutions. Further, our initial trial and error attempts to monitor these institutional programs were exacerbated because there were relatively few state agencies that exerted the kind of control over institutions in their state that they are now beginning to exert. We did the best we could in shouldering this unexpected new responsibility and made some mistakes; we still do; but our record is good. We also realize that these problems are not solved though our methods are improving, so we have committees at work to continue to examine the best ways to evaluate institutions with off-campus programs.

2. the evaluation of institutions with external graduate degrees. This issue continues to challenge the regionals, and it is a source of continuing debate among institutions at the graduate level as well as in the public arena. The processes and outcomes of these institutions receive intensive scrutiny by the regional accrediting commissions; we continue to try to determine the meaning of degrees and the characteristics of graduate degrees.

3. the specificity of standards or criteria. Some regionals have quite specific standards, while others have more general criteria. The level of detail among the regionals' criteria varies considerably. These differences come into focus primarily when one regional is examining a program in another region, with representatives of that other regional serving on the evaluation team. A concerted effort is being made to include outcome criteria as well as process and resource criteria in the commissions' evaluative criteria.

4. determination of what characterizes an institution which should be considered operationally separate or separately accreditable. Some regionals strongly question the concept of a "national university" that has relatively permanent sites in another region and offers fully developed programs being regarded as included in the accreditation of the home institution.

5. the evaluation of institutions perceived as "nontraditional" because they offer new ways of learning to new clienteles, while of continuing interest, is not an area of major concern, in my opinion. I think that we have ample evidence from our experience that these institutions meet existing criteria for accreditation. We encourage innovative and creative programs in institutions, so long as the programs are appropriate to an institution's mission and quality and integrity are maintained. There is a good deal of evidence that these kinds of programs have entered the educational mainstream. Three CIC (Big Ten and University of Chicago) institutions offer external degree programs, and correspondence study is legitimized as never before.

6. institutions long in existence which are threatened in terms of their very survival by dwindling enrollments, fierce competition for students, aging faculties, and a myriad of other problems at the base of which is fiscal integrity. The regionals know that they must learn to work in new and sensitive ways with such institutions, which often require repeated monitoring.

Let me cite just a few examples of "nontraditional" institutions which appear to be quite effective:

+New York State Board of Regents--the Regents degree of the State University of New York, an external degree

+Metropolitan State University, Minnesota, a competency-based program

+DePaul's School for New Learning (Illinois) and Mundelein's Weekend College (Illinois)

+John Wood Community College, Illinois, a "common market" institution utilizing and paying for resources of its neighboring private institutions, a proprietary institution, a vocational institute in the city, and a community college across the river along with its own individualized instruction to offer associate degrees

Now let me list just a few examples of the sequential evaluations across regional boundaries that have occurred in the last few years: Union for Experimenting Colleges and Universities (Ohio), Antioch (Ohio), Central Michigan University, Columbia College (Missouri), Webster College (Missouri), Nova University (Florida), Maharishi International University (Iowa), Goddard College (Vermont), LaVerne University (California), and Pepperdine University (California). In my own region during the current year we had fifteen evaluations which examined off-campus programs within a state and in other regions.

One thing to be kept in mind is that these evaluations place an enormous additional burden on the accrediting commission and on the institution, both in terms of staff time and money. The cost of an evaluation which has a team with representatives from several regions and visits several sites in sequence can range from $10,000 to $25,000 for evaluator fees alone. We do think, though, that this sequential, interregional evaluation process is the best means yet devised to monitor the quality of institutions with far-flung programs.

The regionals have been more effective than the public knows in eliminating problems in some institutions. We do examine institutions with problems more often (one four times in five years); we do impose stipulations, place some institutions on probation, fail to grant candidacy, and drop some institutions from candidacy. Given the litigious climate, the regionals have done very well. We are mindful, through all of our evaluations, that our responsibility is to assist institutions in their improvement, to make sure that their changes are productive, and to encourage creative innovation that is also responsible, so that we can continue to provide public assurance of institutional effectiveness.

The Regionals and the States: Differences and Suggestions for Cooperation

What are the differences between regional accrediting commissions and state agencies, and how may we work more closely together?

There are several differences between regional accrediting commissions and state agencies:

1. The focus of the regional accrediting commission is on the institution, while the focus of the state agency is on the exercise of its constitutional mandate for wise expenditure of state resources.

2. The accrediting commissions are private, voluntary, nongovernmental associations of institutions that subscribe to certain standards for members and that meet those criteria themselves. State agencies are constitutionally mandated to incorporate, charter, or license postsecondary educational institutions in some manner. They may set the legal conditions under which institutions in their states may operate and offer degrees.

3. Regionals are concerned, in reviewing a new program, with whether the program is related to the institution's mission, whether the institution has the resources and processes to initiate, monitor, and maintain the program, and whether the program is of acceptable quality. States have an additional concern--the actual need for the program in relation to existing programs in the state.

4. Regionals treat public and private institutions alike. States often make a differential between treatment of public institutions, for which they have a clear responsibility, and of private institutions, for which their legal responsibility is less clear.

5. Regionals are supported almost entirely by membership dues and evaluation fees. State funding supplies the money for the state agencies.

6. Regionals and state agencies differ in their concerns for and control of institutions that offer programs off campus in another state. While assuring the quality of off-campus programs remains a central concern of the regionals, they have not prohibited their institutions from establishing such programs. States are equally concerned about the educational quality of the programs; but they are also responsive to the needs of their own institutions and their concerns that such programs compete unfairly for an existing student market. States may adopt legislation determining what shall and shall not be permitted to operate in their states, except for military bases, which are federal enclaves.

7. While there is a common purpose among the regionals and a high degree of congruity in their policies and procedures,
the fifty state agencies have greatly varied policies and procedures, depending upon the mandate of the state responsible for the agency.

How may we work more closely together?

It is clear that the roles and responsibilities of state coordinating agencies and institutional accrediting commissions, while different, are also becoming more complementary, if not common, and need to be articulated. Cooperative arrangements need to be developed to avoid duplication of effort on the part of institutions. The primary caution of the regionals would be that the autonomy of the institution not be threatened by such cooperation. The regional accrediting commission must continue to work through its institutions.

Here are some of the ways that we have begun to work together:

1. A significant example is the meeting of the regional staff officers and the SHEEO executive officers and the development of the Statement on Accreditation/State Policies and Relations in June 1979. SHEEO has adopted the statement, and the regionals are reviewing it for implementation in their areas. The agreement includes eight points which are largely possible to achieve:

+more communication through exchange of information, periodic meetings;
+inviting each other to meetings as participants and observers; sharing the publications of each; communicating individually on problems;
+regionals notifying state agencies of schedules of accreditation reviews within the state; instructing institutions and teams to meet with state officials where appropriate; inviting as observers where appropriate;
+still an open question: having regionals invite representatives from state higher education associations directly rather than through institution presidents to serve on review teams to institutions within the state;
+explore the possibility of contractual arrangements such as that developed between the Maryland Board of Higher Education and Middle States... specifying the role and responsibilities of each including the possibility of joint evaluations where appropriate;
+regarding out-of-state institutions operating branches or programs within a state, inform all institutions that such branches must have prior approval of a state agency before establishment. (We do this.) Assuring that each unit will be evaluated by a visit on site.
+Encourage the military to continue and expand "consultation" visits.
+Regionals will explore the possibility of public release of reports... or portions essential if accreditation is used as a part of a state accountability system.

This discussion is continuing, and more relationships are developing.

2. Some regionals, such as Southern, have annual meetings with the state agencies in their region. This is a practice which could be productive for all regions.

3. A number of individual states have individual working arrangements with the regionals. North Central and the Texas Coordinating Board have an agreement that institutions with already established off-campus operations in Texas will have all such activities evaluated on-site by the accrediting association of that institution's parent campus, or in response to a request by the Coordinating Board for a special on-site review.

4. The Northwest Commission on Colleges in 1978 agreed to cooperate with the community colleges in the State of Washington in helping them to satisfy the requirements of PL 94-482. Cooperative arrangements resulted in adapting Commission standards and self-study requirements so that the community colleges, with little additional information, could satisfy the PL 94-482 requirements. The procedure has been used in five institutions with mixed success, but it has seemed to benefit institutions and to provide the state agency with greater understanding of nongovernmental accreditation processes.

5. The evaluations by regional accrediting commissions in states outside their own region have increasingly involved state personnel, with the support of the institution. The institutions must request this involvement.

Conclusion

In this paper I have attempted to describe some of the ways in which the regional accrediting commissions are responding effectively in the evaluation of rapidly changing postsecondary education institutions. I have also pointed out some differences between the roles of the accrediting commissions and the state agencies as I see them, and I have suggested some ways in which we might develop more cooperative relationships.

Our primary concern is that our institutions and the agencies which serve them remain responsive and responsible, and that we maintain and enhance the learning climate for students in this complex and changing age.

--Patricia A. Thrash
July 28, 1980

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